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Attorneys for Plaintiffs
Planet Aid Inc. and Lisbeth Thomsen

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PLANET AID INC.; and LISBETH
THOMSEN,

Plaintiffs,

v.

REVEAL, CENTER FOR INVESTIGATIVE
REPORTING; MATT SMITH; and AMY
WALTERS,

Defendants.

Case No. 17-cv-03695-MMC

**EXHIBITS TO FIRST AMENDED
COMPLAINT**

Judge: Hon. Maxine Chesney

- 1 Exhibit A: March 19, 2016 Article entitled “Alleged cult leader plays shell game with US
2 foreign aid” (the “March 19th Article”), available at
3 [https://www.revealnews.org/episodes/alleged-cult-leader-plays-shell-game-with-](https://www.revealnews.org/episodes/alleged-cult-leader-plays-shell-game-with-us-foreign-aid/)
4 Exhibit B: May 23, 2016 Article entitled “US taxpayers are financing alleged cult through
5 African aid charities” (the “May 23rd Article”), available at
6 [https://www.revealnews.org/article/us-taxpayers-are-financing-alleged-cult-](https://www.revealnews.org/article/us-taxpayers-are-financing-alleged-cult-through-african-aid-charities/)
7 Exhibit C: May 23, 2016 Article, entitled “How the USDA (inefficiently) turns grain into
8 cash for charities,” available at [https://www.revealnews.org/article/how-the-usda-](https://www.revealnews.org/article/how-the-usda-inefficiently-turns-grain-into-cash-for-charities/)
9 Exhibit D: August 1, 2016 Article entitled “UNICEF cuts off funding to nonprofit linked to
10 alleged cult,” available at [https://www.revealnews.org/article/unicef-cuts-off-](https://www.revealnews.org/article/unicef-cuts-off-funding-to-nonprofit-linked-to-alleged-cult/)
11 Exhibit E: August 17, 2016 Article entitled “Congresswoman calls for US investigation of
12 Planet Aid,” available at [https://www.revealnews.org/blog/congresswoman-calls-](https://www.revealnews.org/blog/congresswoman-calls-for-u-s-investigation-of-planet-aid/)
13 Exhibit F: August 18, 2016 Article entitled “McCollum calls for U.S. investigation of Planet
14 Aid,” printed in the MINNPOST, available at [https://www.minnpost.com/politics-](https://www.minnpost.com/politics-policy/2016/08/mccollum-calls-us-investigation-planet-aid/)
15 Exhibit G: August 30, 2016 Article entitled “Mexico won’t arrest Danish fugitive wanted for
16 fraud,” available at [https://www.revealnews.org/article/mexico-wont-arrest-](https://www.revealnews.org/article/mexico-wont-arrest-danish-fugitive-wanted-for-fraud/)
17 Exhibit H: January 31, 2017, Article entitled “USDA said it didn’t know charity had
18 problems; documents show otherwise,” available at
19 [https://www.revealnews.org/article/usda-said-it-didnt-know-charity-had-problems-](https://www.revealnews.org/article/usda-said-it-didnt-know-charity-had-problems-documents-show-otherwise/)
20 Exhibit I: March 28, 2017 Article entitled “On-second thought UNESCO rescinds prize for
21 scrutinized group,” available at [https://www.revealnews.org/article/on-second-](https://www.revealnews.org/article/on-second-thought-unesco-rescinds-prize-for-scrutinized-aid-group/)
22 Exhibit J: March 28, 2017 Article entitled “ “US foreign aid follows complex path to
23 teachers group coffers,” available at [https://www.revealnews.org/article/us-](https://www.revealnews.org/article/us-foreign-aid-follows-complex-path-to-teachers-groups-coffers/)
24 Exhibit K: April 11, 2017, Article entitled “Federal investigations launched into charity
25 group. US funds keep following,” available at
26 [https://www.revealnews.org/blog/two-federal-investigations-launched-into-](https://www.revealnews.org/blog/two-federal-investigations-launched-into-charity-group-u-s-funds-keep-flowing/)
27 Exhibit L: May 11, 2017 Article entitled “Government officials warned colleagues the charity
28 was a cult to no avail,” available at [https://www.revealnews.org/blog/government-](https://www.revealnews.org/blog/government-officials-warned-colleagues-the-charity-was-a-cult-to-no-avail/)
29 Exhibit M: May 17, 2017 Article entitled “Don’t be Deceived. Planet Aid is in it for itself,”
30 available at <http://www.richmond-dailynews.com/2012/04/dont-be-deceived->

planet-aid-in-it-for-itself

Exhibit N: May 23, 2016 Article entitled “Planet Aid’s ubiquitous clothing donation boxes aren’t so charitable,” available at <https://www.revealnews.org/article/planet-aids-ubiquitous-clothing-donation-boxes-arent-so-charitable/>

Exhibit O: August 21, 2017 Article entitled “Workers at African aid program linked to alleged cult sue for back pay,” available at <https://www.revealnews.org/article/workers-at-african-aid-program-linked-to-alleged-cult-sue-for-back-pay/>

Exhibit P: A 53 minute broadcast aired on March 19, 2016 which was updated and aired on May 28, 2016, and June 2, 2016, and which accompanied the March 19th Article, “Alleged cult leader plays shell game with USDA funds;” (the “March 19th Podcast”).

Exhibit Q: May 31, 2016, 22 minute interview with Amy Walters on the Internet based newscast, RISING UP WITH SONALI, titled “Yellow Planet Aid boxes are front for dubious Danish organization.”

Exhibit R: March 25, 2016 interview on radio station KCRW with Amy Walters and Matt Smith (the “March 25th Broadcast”).

Exhibit S: May 23 and 24, 2016 broadcasts on radio and television station (NBC4 Washington), in what it called a “joint investigation” by that channel’s I TEAM AND CIR, titled “Behind the Bins: Former Planet Aid Employees Describe Cult-Like Experience,” and co-authored by Defendants Smith and Walters. (the “NBC Broadcast”).

Exhibit T: August 31, 2016 broadcast in which Defendants Smith and Walters gave an interview for a television program that aired in in Denmark, titled “Where’s Amdi,”

Exhibit U: Social media used in furtherance of the scheme.